

APR - 2 2019

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY
OFFICE OF ELECTRICITY

Electricity Delivery and
Energy Reliability

EDECSAMEX, S.A. de C.V.

Docket No. EA-470

**APPLICATION OF EDECSAMEX, S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

Pursuant to Section 202(e) of the Federal Power Act (16 U.S.C. § 824a(e)), and regulations thereunder (10 C.F.R. §§ 205.300, *et seq.*), EDECSAMEX, S.A. de C.V. ("EDECSAMEX") hereby submits this application (the "Application") for blanket authorization from the Department of Energy ("DOE" or the "Department") to transmit electric energy from the United States to Mexico for a term of five years. In support of its Application, EDECSAMEX respectfully shows as follows:

I. DESCRIPTION OF THE APPLICANT

The exact legal name of the applicant is EDECSAMEX, Sociedad Anónima de Capital Variable (also known as EDECSAMEX, S.A. de C.V.). EDECSAMEX was incorporated under the laws of Mexico as a Sociedad Anónima de Capital Variable with its principal place of business in Mexico City, Mexico. EDECSAMEX is owned by Vahid Sadeghpour, a U.S. citizen, with one share (0.002%) and by Energía, Desarrollo y Consultoría, S.A. de C.V., a company incorporated in El Salvador, with 49,999 shares (99.998%).

EDECSAMEX is authorized by the Centro Nacional de Control de Energía ("CENACE"), Mexico's national grid operator, to transact as a wholesale power marketer throughout Mexico. As a result of its authority granted by CENACE, EDECSAMEX has been actively participating as a power marketer within Mexico and currently imports electric energy into Mexico from Guatemala, with plans to export electric energy from Mexico into Guatemala as well as Belize. EDECSAMEX is also authorized by CENACE to import and export electricity with the United States.

EDECSAMEX intends to purchase excess electricity on the regional market of the Electric Reliability Council of Texas ("ERCOT") for export into Mexico. EDECSAMEX also intends to apply for authority from the Federal Energy Regulatory Commission ("FERC") to sell electricity at wholesale market-based rates.

The energy that EDECSAMEX proposes to export to Mexico will be purchased as excess energy from third parties, such as electric utilities and federal power marketing agencies, pursuant to voluntary agreements, and wheeled over existing transmission facilities owned by third parties. Thus, the exported

energy will be surplus to the needs of the selling entities and the overall electrical system and will not impact the reliability of the transmission grid.

II. PARTNERS

EDECSAMEX is not seeking authorization to export power on behalf of, or in conjunction with, any partners.

III. COMMUNICATIONS

Communications regarding this Application should be addressed to the following persons:

Vahid Sadeghpour
Sole Administrator, EDECSAMEX, S.A. de C.V.
2615 Centenary Street
Houston, Texas 77005
(713) 851-0473
vsadeghpour@edecsa.net

Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
124 Palm Blvd.
Missouri City, Texas 77459
(713) 907-5505
gregarroyo@aol.com

IV. JURISDICTION

Under Section 202(e) of the FPA (16 U.S.C. § 824a(e)), and the Department's regulations, 10 C.F.R. §§ 205.300, *et seq.*, persons seeking to transmit electric energy from the United States to a foreign country must secure an order from the Department authorizing the export. EDECSA does not know of any other federal, state or local government other than DOE that has jurisdiction over the actions to be taken under the authority set out in this Application.

V. TECHNICAL DISCUSSION OF PROPOSAL

EDECSAMEX respectfully seeks authority to transmit electric energy across international transmission facilities into Mexico as a power marketer for a term of five years. Neither EDECSAMEX, nor any of its owners, own or control (nor hold an interest in other entities that own or control) any electric power generation or transmission facilities within the United States. Additionally, neither EDECSAMEX nor any of its owners hold a franchised electric power service area nor have a native load obligation.

EDECSAMEX intends to export electricity under terms and conditions to be negotiated in the future over existing interconnections between the United States and Mexico. Exhibit C to the Application provides the present owner, location, voltage, and presidential permit number of the transmission facilities that are currently in operation.

The initial commercial plan of EDECSAMEX is to source excess power supply from the ERCOT market and sell such supply into the Mexican market. EDECSAMEX may eventually source excess electric

energy from other markets bordering with Mexico and thus seeks a blanket authorization. As the electric power that EDECSAMEX plans to export to Mexico will be excess supply, its commercial plan does not impact native load requirements. Moreover, as the electric power it plans to export will be wheeled over transmission facilities owned and operated by third parties, it will not affect reliability of the ERCOT transmission network, or other networks if and when it expands its commercial plan into other markets. Therefore, the export of electric energy to Mexico by EDECSAMEX will not impact the sufficiency of electric supply nor the reliability of the transmission grid.

EDECSAMEX will complete all other commercial arrangements and required regulatory approvals to support the export of excess power from ERCOT or any other regional entity. These include but are not limited to the following: (i) each transaction that EDECSAMEX initiates will be scheduled with the appropriate balancing authority, such as ERCOT, in compliance with the applicable reliability standards and guidelines of the North American Electric Reliability Corporation ("NERC") and the applicable regional operators; (ii) all necessary approvals to transmit the exported energy over existing transmission facilities and international interconnections will be obtained, including compliance with the procedures as may be required by the owners of such transmission facilities; (iii) ensuring that each transaction complies with the export limits as set by the Department from time to time; and (iv) that all reporting requirements of the Department are met.

VI. PROCEDURES

As in prior DOE orders granting export authorizations to power marketers, EDECSAMEX respectfully requests that the reliability analysis and sufficiency of supply findings of such orders be applied for its Application. EDECSAMEX agrees to comply with the terms and conditions for cross-border facilities as well as any other export limitations the Department deems appropriate. EDECSAMEX will: (i) obtain all necessary permissions for transmission access over the facilities listed in Exhibit C; (ii) comply with all reliability criteria, standards, and guidelines of NERC, ERCOT and other applicable regional entities; (iii) comply with all reporting requirements, including those of the DOE, ERCOT, and/or other applicable entities, such as compliance with 10 C.F.R. § 205.308; and (iv) comply with any export limits established for the transmission facilities authorized by any permit granted by the Department, or otherwise ensure the terms and conditions set forth in the export authorization permit are not violated.

VII. VERIFICATION, REQUIRED COPIES AND FEE

The verification executed by the authorized representative of EDECSAMEX in accordance with 10 C.F.R. § 205.302(h) is enclosed with the Application. In accordance with 10 C.F.R. § 205.307, an original

of the Application and two conformed copies are being provided to the Department. Moreover, in accordance with 10 C.F.R. § 205.309, a check in the amount of \$500.00 payable to the Treasurer of the United States is enclosed and a copy of this Application will be provided to the Federal Energy Regulatory Commission.


VIII. LIST OF EXHIBITS

In accordance with the requirements of 10 C.F.R. § 205.303, the following exhibits are attached hereto:

- Exhibit A: Transmission Agreements
- Exhibit B: Opinion of Counsel
- Exhibit C: International Transmission Facilities (submitted in lieu of maps)
- Exhibit D: Irrevocable Power of Attorney
- Exhibit E: Statement of Corporate Relationships or Existing Contracts
- Exhibit F: Operating Procedures

IX. CONCLUSION

WHEREFORE, EDECSAMEX S.A. de C.V. respectfully requests that this Application for Authorization to Transmit Electric Energy to Mexico be considered and approved.

By: 
Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
Texas Bar Number 01358700

**APPLICATION OF EDECSAMEX S.A. de C.V.
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO MEXICO**

VERIFICATION

STATE OF TEXAS

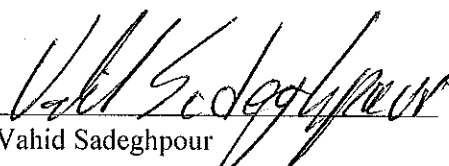
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COUNTY OF HARRIS

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I, Vahid Sadeghpour, Sole Administrator of EDECSAMEX, S.A. de C.V., am authorized to provide this verification on behalf of EDECSAMEX, S.A. de C.V. and have knowledge of the matters set forth in the foregoing Application of EDECSAMEX, S.A. de C.V. for Authorization to Transmit Electric Energy to Mexico. I hereby verify that the contents thereof are true and correct to the best of my knowledge, information and belief.

By: 
Vahid Sadeghpour
Sole Administrator

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED BEFORE ME by the said Vahid Sadeghpour, this
1st day of April 2019.


Notary Public for the State of Texas

My Commission Expires: 11/08/2022



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**EXHIBIT A
TRANSMISSION AGREEMENTS**

EDECSAMEX certifies that it holds no transmission reservations or transmission agreements within the United States.

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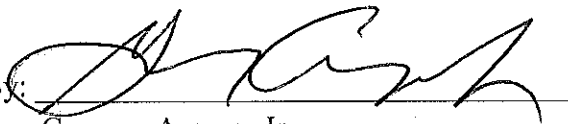
**EXHIBIT B
OPINION OF LEGAL COUNSEL**

Pursuant to 10 C.F.R. § 205.303(b), this opinion is rendered regarding the Application of EDECSAMEX, S.A. de C.V. ("EDECSAMEX") for the Authorization to Transmit Electric Energy to Mexico to which this Exhibit B is incorporated by reference (the "Application").

After reviewing the underlying support for the Application, the relevant corporate documents of EDECSAMEX and the pertinent Federal and State laws, it is my opinion that:

1. The proposed export of electricity is within the corporate power of EDECSAMEX, and
2. EDECSAMEX has complied, and will comply, with all pertinent Federal laws of the United States and all the pertinent State laws.

This opinion is rendered as of the date of the Application and I assume no obligation to update this opinion. This opinion is rendered solely for the purposes of the Application and is not to be used, made available or relied upon for any other purpose or by anyone other than the reviewing entity, unless expressly permitted in writing by me.

By: 
Gregory Arroyo, Jr.
Counsel for EDECSAMEX, S.A. de C.V.
Texas Bar Number 01358700

**APPLICATION OF EDECSAMEX S.A. de C.V.
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**EXHIBIT C
INTERNATIONAL TRANSMISSION FACILITIES
(SUBMITTED IN LIEU OF MAPS)**

A list of the existing and permitted international transmission facilities at the border between the United States and Mexico available for open access transmission is listed below:

Present Owner	Location	Voltage	Presidential Permit No.
Comisión Federal de Electricidad	Falcon Dam, TX	138 kV	N/A
	Redford, TX	7.2 kV	PP-51
	Presidio, TX	13.8 kV	PP-03
Baja California Power, Inc.	Imperial Valley, CA	230 kV	PP-234
Generadora del Desierto - WAPA	San Luiz, AZ	230 kV	PP-304
AEP Texas Inc.	Brownsville, TX	138 kV	PP-425
	Brownsville, TX	69 kV	PP-425
	Laredo, TX	138 kV	PP-423
	Laredo, TX	230 kV	PP-423
	Eagle Pass, TX	138 kV	PP-424
El Paso Electric Company	Diablo, NM	115 kV	PP-92
	Ascarate, TX	115 kV	PP-48
San Diego Gas & Electric	Miguel, CA	230 kV	PP-68-2
	Imperial Valley, CA	230 kV	PP-79
Sharyland Utilities	McAllen, TX	138 kV	PP-285
Nogales Transmission	Nogales, AZ	230 kV	PP-420

**APPLICATION OF EDECSAMEX S.A. de C.V.
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**EXHIBIT D
IRREVOCABLE POWER OF ATTORNEY**

This IRREVOCABLE POWER OF ATTORNEY is made this 1st day of April 2019 by EDECSAMEX, S.A. de C.V., (the "Principal"), a Sociedad Anónima de Capital Variable incorporated under the laws of Mexico, with its corporate office in Mexico City, Mexico.

1. Appointment. The Principal appoints Rebecca Elizabeth Ramirez, who may be served process at 2615 Centenary Street, Houston, Texas 77005, as its true and lawful agent ("Agent") for the limited purpose set forth herein.
2. Scope of Authority. The Agent shall have the limited power of attorney and authority to receive service of process for any and all matters relating to the Principal's standing before the Department of Energy and its Office of Electricity regarding the Principal's export permit to transmit electric energy to Mexico.
3. Irrevocability. This Power of Attorney is irrevocable by the Principal for the five-year term of the export permit issued allowing it to transmit electric energy to Mexico.


IN WITNESS WHEREOF, the Principal has caused this Power of Attorney to be duly executed on the first date set forth above.

EDECSAMEX, S.A. de C.V.

By: 

Vahid Sadeghpour
Sole Administrator

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED BEFORE ME by the said Vahid Sadeghpour, this 1st day of April 2019.


Notary Public for the State of Texas

My Commission Expires: 11/08/2022



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**EXHIBIT E
STATEMENT OF CORPORATE RELATIONSHIPS OR EXISTING CONTRACTS**

Not applicable.

**APPLICATION OF EDECSAMEX S.A. de C.V.
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**EXHIBIT F
OPERATING PROCEDURES**

Not applicable.